

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO.:23-24670-CIV-LENARD/DAMIAN

SHANTEE REESE,

Plaintiff,

v.

ALORICA, INC.,
a Foreign Profit Corporation,

Defendant.

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO COMPLAINT**

Defendant, Alorica, Inc. ("Defendant"), by and through their undersigned counsel, hereby moves, on an unopposed basis, for an additional 2-week extension of time to respond to Plaintiff's Complaint, up to and including, Tuesday, January 16, 2024. In support, Defendant states as follows:

1. On November 02, 2023, Plaintiff, Shantee Reese ("Plaintiff") filed the operative Complaint alleging claims under the Florida Civil Rights Act of 1992 ("FCRA") and the Miami-Dade County Human Rights Ordinance ("MDHRO").
2. Defendant retained undersigned counsel and Jackson Lewis, P.C. to represent it in connection with this case, and removed the instant case to this Court.
3. Counsel for the parties have made some progress towards an early resolution of this matter and wish to continue to explore the possibility this matter could resolve without a response to the Complaint having to be filed.
4. In light of the above, Defendant requests that the Court grant Defendant fourteen (14) additional days to respond to the Complaint up to including, Tuesday, January 16, 2024.

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5. Undersigned counsel conferred with Plaintiff's counsel regarding this request for an extension and Plaintiff's counsel **does not oppose** this request.

6. This Motion is made in good faith and not for purposes of delay. Moreover, no party will be prejudiced by the granting of this Motion.

WHEREFORE, Defendant respectfully requests that the Court grant Defendant's unopposed request for a 14-day extension of time, up to and including Tuesday, January 16, 2024, in which to file their response to Plaintiff's Complaint.

Dated: January 2, 2024

Respectfully submitted,

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/s/ Dion Cassata
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Counsel for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 2, 2024, a true and correct copy of the foregoing document was served via transmission of Notice of Electronic Filing generated by CM/ECF on all counsel of record.

s/ Dion J. Cassata
Dion J. Cassata, Esq.

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